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October 16, 2013

VIA EMAIL AND FAX

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**RE: *Ollie Greene, et al v. Toyota Motor Corporation et al*; Cause No. 3:11-cv-00207-N
in the USDC for the Northern District of Texas, Dallas Division.**

Dear Counsel:

I am writing in response to Ms. Clark's October 11, 2013, letter and Mr. Hickland's October 15, 2013, letter, both of which inquire about dates for expert depositions. Ms. Clark, while Plaintiffs can appreciate your eagerness to arrange a schedule for the expert depositions, the dates you propose are unworkable since some of the experts will not have completed their initial and/or rebuttal reports by the dates you suggest. This theme is repeated with at least one of the dates proposed by Mr. Hickland. Additionally, since the parties have not yet decided which experts will be testifying experts, and considering that the schedules of counsel and the experts are quite fluid, Plaintiffs believe it is premature to schedule specific days for expert depositions that will occur no earlier than approximately ten (10) weeks from today.

Therefore, assuming the expert deadlines will remain as now scheduled, Plaintiffs believe there will be sufficient time "after" expert reports have been disclosed to devise a schedule for the expert depositions. In the meantime, Plaintiffs will ask their potential testifying experts to hold as many dates open of the days following dissemination of the reports as possible and ask that Defendants do the same. That way we can ensure that all experts will be deposed by the deadline.

Sincerely,

Aubrey "Nick" Pittman

cc: All Counsel

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TELEPHONE NUMBER:	CLIENT/MATTER NUMBER:
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TOTAL NUMBER OF PAGES, INCLUDING COVER:	CC:
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